

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

FRIENDS OF GEORGE’S, INC.,)	
)	Case No. 2:23-cv-02176-TLP-tmp
PLAINTIFF,)	
)	
)	
)	COMPLAINT FOR VIOLATIONS OF
)	THE CIVIL RIGHTS ACT OF 1871, 42
v.)	U.S.C. § 1983
)	
)	
)	
STEVEN J. MULROY, <i>in his official and</i>)	
<i>individual capacity as District Attorney</i>)	
<i>General of Shelby County, Tennessee,</i>)	
)	
DEFENDANTS)	
)	

DECLARATION OF MYSTIE-ELIZABTHE WATSON

Mystie-Elizabthe Watson, under penalty of perjury, declares as follows:

1. I am over the age of eighteen (18) and am the Producer and Director of Absent Friends.
2. Absent Friends is a theatre organization in Memphis, Tennessee that hosts monthly showings of the movie Rocky Horror Picture Show at the Evergreen Theatre.
3. Rocky Horror Picture Show is a musical comedy movie that was released in 1975. The film is rated R, but has been shown on network television, and is currently available for streaming on Hulu in the U.S., and Disney+ in the U.K.

4. While the film plays on the theatre screen, actor members of Absent Friends perform a live simultaneous show in drag, miming the actions of the actors on screen and lip-synching the characters' dialogue.
5. The performance involves a significant amount of audience participation.
6. Live performances of this kind are a long-standing Rocky Horror Picture Show tradition and can be found in venues across the country.
7. Our performances have always been open to all ages.
8. Our performances have historically been attended by families attending the show together and by groups of minor teenagers.
9. Absent Friends is aware of the amendments to **T.C.A. § 7-51-1407**, which were signed into law by Governor Bill Lee on February 27, 2023 and take effect on April 1, 2023
10. Absent Friends is concerned that the law could subject its monthly performances to police surveillance, and put its performers at risk of criminal charges.
11. Rather than risk the well-being of its drag performers, Absent Friends made the decision to restrict future performances to audience members 18 years of age and older.
12. Were it not for this law, Absent Friends would not have added an age restriction to its monthly performances.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated this 29th day of March, 2023

/s/ Mystie-Elizabeth Watson

Mystie-Elizabeth Watson